Message

From: Steve Salzman [salzman@greenwaypartners.net]

Sent: 10/25/2013 5:10:54 PM

To: Prat, Rachel@Waterboards [Rachel.Prat@waterboards.ca.gov]; Fondahl, Lauren [Fondahl.Lauren@epa.gov]
CC: bgehrke@ci.eureka.ca.gov; Dougherty, Mona@Waterboards [Mona.Dougherty@waterboards.ca.gov]; Reed,

Charles@Waterboards [Charles.Reed@waterboards.ca.gov]; Bruce Young [byoung@ci.eureka.ca.gov]; Travis

Clohessy [clohessy@greenwaypartners.net]

Subject: RE: Parcel M Project

Rachel,

Thanks for the response. I could attend the call if you want me to explain our grand plan for biosolids utilization. Bruce Gehrke is starting work on the NPDES application for the plant. A short written memo of how we should proceed with the joint application process would be very helpful. Thanks again for being proactive on this project. SS

From: Prat, Rachel@Waterboards [mailto:Rachel.Prat@waterboards.ca.gov]

Sent: Wednesday, October 23, 2013 3:49 PM

To: Steve Salzman

Subject: RE: Parcel M Project

Hi Steve,

I wanted to let you know that we are hoping to talk to Lauren next week to discuss the specifics on how to proceed with reviewing/drafting/adopting this joint NPDES permit. I think this may be the first joint NPDES permit in our Region. Either Charles, Mona or myself will get back to you after our conversation with Lauren to explain the permitting process and who to work with/talk to regarding the development of the different sections of this NPDES permit.

We will also address Army Corps need of documentation form our office for the Section 10 permit and the 401 issue too.

Thank you, Rachel

From: Steve Salzman [mailto:salzman@greenwaypartners.net]

Sent: Tuesday, October 22, 2013 3:27 PM

To: Prat, Rachel@Waterboards

Cc: Travis Clohessy; Bruce Gehrke; <u>byoung@ci.eureka.ca.gov</u>

Subject: RE: Parcel M Project

Hi Rachel,

I have repeatedly tried to contact the EPA find out what they will required for biosolids application on Parcel M. No luck. I'll keep trying.

I just got off the phone with the Army Corps (Nina Cavett-Cox) regarding our Section 10 permit. They already completed the public notice on our project and did not receive any comments. Now they need to complete their files with concurrences and/or permit from other responsible agencies. From the RWQCB, they need a letter or email stating that the RWQCB will not issue WDRs for application of biosolids in "waters of the US" as they are not within your jurisdiction and that you are differing to the US EPA for permit requirements. She also asked about the Section 401 Water Quality Certification. Does the RWQCB issue WQCs for projects such as this one? Please let me know what you can do for us. Thanks, SS

From: Prat, Rachel@Waterboards [mailto:Rachel.Prat@waterboards.ca.gov]

Sent: Friday, October 11, 2013 5:20 PM

To: salzman@greenwaypartners.net

Subject: Parcel M Project

Hi Steve,

I thought I had an e-mail or document of some sort explaining the rationale behind the Parcel M Biosolids land application project requiring coverage under an NPDES permit but I can't seem to find it. So here's the details that I remember....

Since a portion of the land application area on Parcel M (74 acres) has been identified/classified as "wetland waters of the United States" the project requires permitting via a federal USEPA NPDES permit rather than state issued WDRs.

Hope this helps, Rachel

Rachel Prat
Environmental Scientist
Watershed Protection Division

North Coast Water Quality Control Board www.waterboards.ca.gov/northcoast

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